

[UNDER SEAL]

MAY 19 2021

COUNT ONE

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

4. Firearms Not to be Carried without License, on or about January 7, 2019, at Case Number CP-02-CR-0009241-2016, in the Court of Common Pleas, County of Allegheny, Commonwealth of Pennsylvania; and

5. Manufacture, Delivery, or Possession with Intent to Manufacture or Deliver a Controlled Substance, on or about January 7, 2019, at Case Number CP-02-CR-0009241-2016, in the Court of Common Pleas, County of Allegheny, Commonwealth of Pennsylvania, did knowingly possess in and affecting interstate commerce, a firearm and ammunition, namely,

1. a Taurus, model G3C, 9mm caliber pistol, bearing serial number ABK061358;
2. a Springfield Armory, model XDS-45 ACP, .45 ACP caliber pistol, bearing serial number BY320612;
3. a Phoenix Arms, model HP22A, .22 caliber pistol, bearing serial number 4255879;
4. Federal 9mm caliber ammunition; and
5. Remington .22 caliber long rifle hollow point ammunition.

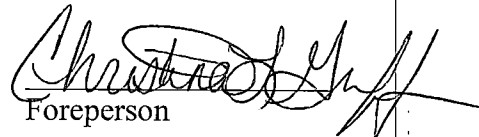
In violation of Title 18, United States Code, Section 922(g)(1).


FORFEITURE ALLEGATIONS

The Grand Jury re-alleges and incorporates by reference the allegation contained in Count One of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 924(d); and Title 28, United States Code, Section 2461(c). As a result of the knowing commission of the violation of Title 18, United States Code, Section 922(g)(1), as charged in Count One of the Indictment, the firearms and ammunition involved in that Count, which were involved in the commission of the offense, are subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1). The property to be forfeited includes:

1. a Taurus, model G3C, 9mm caliber pistol, bearing serial number ABK061358;
2. a Phoenix Arms, model HP22A, .22 caliber pistol, bearing serial number 4255879;
3. Federal 9mm caliber ammunition;
4. Remington .22 caliber long rifle hollow point ammunition;
5. Three (3) 9mm pistol magazines; and
6. One (1) Springfield .45 ACP pistol magazine.

A True Bill,


Foreperson


STEPHEN R. KAUFMAN
Acting United States Attorney
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